

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

SCOTT D. MCCLURG, et al.,)	
)	
Plaintiffs,)	
)	
vs.)	Pertaining to Cases Consolidated for
)	Discovery and Pretrial Proceedings under
MALLINCKRODT LLC, et al.,)	Lead Case No. 4:12CV00361 AGF
)	
Defendants.)	
)	

NOTICE OF VIDEOTAPED DEPOSITION OF ROBERT ZOCH

TO: All counsel of record.

Please take notice that the following deposition will be taken in this matter as follows:

DEPONENT: Robert Zoch

DATE: July 29, 2020

TIME: 9:00 a.m. CST

LOCATION: Deposition will be taken via videographic means due to the
Covid-19 pandemic and related restrictions.

The deposition, which will be stenographically recorded and videotaped, will continue from day to day until completed at the same time and place. Court reporting and video recording will be provided by Alaris Litigation Services, (800) 280-3376. Plaintiff expressly reserves the right to use this deposition at the time of trial. Deponent is to produce the documents described in **Exhibit A** to the deposition and produce same through counsel to Jonathan M. Soper, Humphrey, Farrington & McClain, P.C., 221 West Lexington, Suite 400, Independence, MO 64050, no later than one week prior to the deposition.

Respectfully Submitted,

HUMPHREY, FARRINGTON & McCLAIN, P.C.

/s/ Jonathan Soper

Kenneth B. McClain #32430

Jonathan M. Soper #61204

Colin W. McClain #64012

221 West Lexington, Suite 400

Independence, MO 64050

Telephone: (816) 836-5050

Facsimile: (816) 836-8966

kbm@hfmlegal.com

jms@hfmlegal.com

cwm@hfmlegal.com

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of July, 2020, I electronically filed the above with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to counsel of record.

/s/ Jonathan Soper
Attorney for Plaintiffs

SHOOK, HARDY & BACON LLP
David R. Erickson # 31532MO
Steven D. Soden # 41917MO
Anthony R. Martinez # 61791MO
2555 Grand Boulevard
Kansas City, MO 64108-2613
Phone: (816) 474-6550
Fax: (816) 421-5547
derickson@shb.com
ssoden@shb.com
amartinez@shb.com
**ATTORNEYS FOR DEFENDANT
MALLINCKRODT LLC**

RILEY SAFER HOLMES & CANCELILA,
LLP
Brian O. Watson, #68678MO
70 W. Madison St., Ste. 2900
Chicago, Illinois 60602
Telephone: (312) 471-8700
Facsimile: (816) 836-8966
bwatson@rshc-law.com
**ATTORNEY FOR DEFENDANT
COTTER CORPORATION (N.S.L)**

EXHIBIT A

1. A copy of your most current curriculum vitae;
2. A copy of your entire file related to this matter, including all material you have reviewed, considered, or relied upon in forming your opinions in this case;
3. A copy of all documents prepared by you setting forth your opinions in this case;
4. A copy of all invoices for services rendered and/or receipts for monies received for services rendered in this case;
5. A copy of any time records reflecting your work on this case;
6. A list of all transcripts of testimony that you have reviewed or upon which you rely in forming your opinions in this case;
7. Literature, data, or other documents you have reviewed, considered, or upon which you rely in forming your opinions in this case;
8. All documents you forwarded to any law firm or any lawyer representing the defendants in the course of forming your opinions in this case;
9. Correspondence, including email or other electronic correspondence or other documents, you have exchanged with any other witnesses in this case that relates in any way to this case;
10. A list of cases in which the deponent has testified, either at trial or in deposition.
11. A list of all cases in which the deponent has been retained by attorneys for defendants herein where personal injury has been alleged;
12. List of all documents and tangible things (including but not limited to reports, records, writings, notes, data, computer codes or programs, website, analyses, specimens, films, videos, photographs or recordings of any type) upon which you rely to support any of your opinions in this case;
13. Other documents and/or data considered or relied upon to form your opinions relating to this case;
14. Copies of any notes you have created in connection with this case;